

In the  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

JAMES L. McLEAN, |  
and |  
EDITH L. McLEAN, |  
Plaintiffs, |  
v. |  
RONALD A. RAY, ESQUIRE, |  
and |  
ECONOMOU, FORRESTER & RAY, |  
Defendants. |

Civil Action No. 1:10-CV-456  
(LO/TCB)

**PLAINTIFFS' REQUIRED INITIAL DISCLOSURES PURSUANT TO RULE 26(a)**

Pursuant to FRCP Rule 26(a) Plaintiffs James L. McLean and Edith L. McLean, by their undersigned counsel, make the following disclosures, as required by FRCP Rule 26(a)(1)(A)(i), (ii), and (iii):

1. The names, addresses, and telephone numbers of persons likely to have discoverable information the Plaintiffs may use to support their claims, and the subjects of such information, are:

Plaintiff James L. McLean, Esquire  
c/o Allen H. Sachsel, Esquire  
10521 Judicial Drive, Suite 307  
Fairfax, Virginia 22030  
(703) 385-9400

Subject(s): Violations of the Fair Debt Collection Practices Act, compensatory damages, including amounts expended, and emotional distress;

Defendant Ronald A. Ray, Esquire  
Economou, Forrester & Ray  
122 South Royal Street  
Alexandria, Virginia 22314  
(703) 549-7510

Subject(s): Violations for Fair Debt Collection Practices Act;

George W. Dodge, Esquire  
3444 North Fairfax Drive, Suite 102  
Arlington, Virginia 22201  
(703) 524-9700

Subject(s): Lack of basis for the Guardian/Conservatorship sought in Arlington Case No CL 2009-0550 and Fairfax Case No. CL 2009-0007774 (shown on Mr. Dodge's Report as No. 09-1366);

William J. Olson, Esquire  
114 Creekside Lane  
Winchester, Virginia 22602  
(540) 450-8777

Subject(s): Emotional Distress suffered by Plaintiff James L. McLean, Esquire;

Lawrence T. Jones, Esquire  
1000 Franklin Avenue  
Garden City, New York 11530  
(516) 747-1141

Subject(s): Emotional Distress suffered by Plaintiff James L. McLean, Esquire;

Anthony J. Partipilo, Esquire  
West End Place  
23271 Ventura Boulevard  
Woodland Hills, California 91364  
(818) 225-2468

Subject(s): Emotional Distress suffered by Plaintiff James L. McLean, Esquire;

John J. Lynch, Esquire  
PO Box 280514  
Northridge, California 91328-0514  
(818) 993-6504

Subject(s): Emotional Distress suffered by Plaintiff James L. McLean, Esquire.

2. Documents (by category) Plaintiffs may use to support their claims (including electronically stored information):

Litigation papers and transcripts in *ManorCare of Arlington, Inc. v. Edith L. McLean*, Arlington County, Virginia Circuit Court No. CL 2009-0344, and in *ManorCare of Arlington, Inc. v. Edith L. McLean and James L. McLean*, originally Arlington County, Virginia, Circuit Court No. CL 2009-0550, and transferred to Fairfax County, Virginia, Circuit Court, given number No. CL 2009-0007774 (including discovery requests, responses, and Plaintiff Edith McLean's responses in CL 2009-0344, not yet served).

Location of Documents: In files of Defendants Ronald A. Ray, Esquire, and Economou, Forrester & Ray; also in the Record for CL 2009-0344, which currently is in the Supreme Court of Virginia, Record No. 101800; also in files of Plaintiffs' counsel. Documents in CL 2009-0550 (CL 2009-0007774 in Fairfax County Circuit Court). Note that the Report of the *guardian ad litem*, George W. Dodge, Esquire, shows the case No. as 09-1366. Note further that discovery responses

of Edith L. McLean not yet served are with Plaintiffs' counsel and/or Plaintiff James L. McLean, only, and would not be in Defendants' files.

Papers furnished in discovery to counsel for Plaintiff Edith L. McLean by Defendant Ronald A. Ray, Esquire, in CL 2009-0344.

Location of Documents: In files of Defendants Ronald A. Ray, Esquire, and Economou, Forrester & Ray; also in files of Plaintiffs' counsel; most of these documents also in the files of ManorCare of Arlington, Inc., 550 South Carlin Springs Road, Arlington, Virginia 22204.

Letter of March 24, 2009, to Edith L. McLean from Ronald A. Ray, Esquire, with envelopes, including envelope addressed to James L. McLean, Esquire.

Location of Document: In files of Defendants, and with Plaintiff James L. McLean, Esquire, and with Plaintiffs' counsel. Also likely in files of ManorCare of Arlington, Inc.

Billings from ManorCare of Arlington, Inc., to Edith L. McLean, and documents showing payment(s) to ManorCare from CareFirst Blue Cross/Blue Shield, and/or Medicare.

Location of Documents: In files of Defendants and with Plaintiff James L. McLean, Esquire, and/or Plaintiffs' counsel. Also in files of ManorCare of Arlington, Inc.

Emails and/or letters between Ronald A. Ray, Esquire, and counsel for Edith L. McLean.  
Location: With Defendants and with Plaintiffs' counsel.

Copy of email from Abela, Anthony to Parker, David; Huber, John; Kautz, Amy, with cc to Arlington 527 Donna Rein, dated January 07, 2009 1:31 PM.

Location: With Plaintiff James L. McLean, Esquire, and Plaintiffs' counsel. Likely also with Defendants and with ManorCare of Arlington, Inc. (A copy of this email is annexed.)

Medical and General Powers of Attorney held by James L. McLean, Esquire, for Edith L. McLean.

Location: With Plaintiff James L. McLean, Esquire

3. Damages are for Edith McLean at his point \$6,800.00 for defense of the guardianship/conservatorship proceeding and \$39,820.90 for expenses of the defense of No. CL 2009-0344, plus approximately \$4,500.00 that have not yet been billed. Damages are ongoing in that case.

Damages for James L. McLean, Esquire, are \$4,500.00 for the approximately 15 hours he spent defending the guardianship/conservatorship proceeding. He also suffered emotional distress, most significantly for the guardianship/conservatorship proceeding and its continuation, as described in the Complaint, the Amended Complaint, and the proposed Second Amended Complaint. He seeks \$200,000.00 as compensation for the emotional distress.

Though not technically part of damages, we note that the Plaintiffs seek reasonable attorney's fees in this case, as well as all allowable costs.

/s/

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Allen H. Sachsel  
Virginia Bar No. 65896  
Attorney for James L. McLean and Edith L. McLean  
Law Offices of Allen H. Sachsel  
10521 Judicial Drive, Suite 307  
Fairfax, Virginia 22030  
Telephone Number: (703) 385-9400  
Fax Number: (703) 385-1007  
email: ahs@saarmstrong.net

CERTIFICATE OF SERVICE

I certify that on October 26, 2010, I caused a copy of the foregoing Plaintiffs' Required Initial Disclosures Pursuant to Rule 26(a) to be emailed to:

David J. Gogal, Esquire  
Blankingship & Keith, P.C.  
4020 University Drive, Suite 300  
Fairfax, Virginia 22030  
Phone: (703) 691-1235  
Fax: (703) 691-3913  
email: [dgogal@bklawva.com](mailto:dgogal@bklawva.com)

William B. Porter, Esquire  
Blankingship & Keith, P.C.  
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Phone: (703) 691-1235  
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email: [wporter@bklawva.com](mailto:wporter@bklawva.com)

Michael L. Chang, Esquire  
Blankingship & Keith, P.C.  
4020 University Drive, Suite 300  
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Phone: (703) 691-1235  
Fax: (703) 691-3913  
email: [mchang@bklawva.com](mailto:mchang@bklawva.com)

[agabler@bklawva.com](mailto:agabler@bklawva.com),

[jhall@bklawva.com](mailto:jhall@bklawva.com).

I also caused the original to be mailed to David J. Gogal, Esquire, at his address shown above.

/s/

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Allen H. Sachsel  
Virginia Bar No. 65896  
Attorney for James L. McLean and Edith L. McLean  
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Fairfax, Virginia 22030  
Telephone Number: (703) 385-9400  
Fax Number: (703) 385-1007  
email: ahs@saarmstrong.net

CERTIFICATE OF SERVICE

I certify that on January 18, 2011, I will electronically file the foregoing Plaintiffs' Required Initial Disclosures Pursuant to Rule 26(a) with the Clerk of the Court using the CM/EF system, which will then send notification to the following:

David J. Gogal  
Blankingship & Keith, P.C.  
4020 University Drive, Suite 300  
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/s/

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